

**Remarks**

Reconsideration and allowance of the subject patent application are respectfully requested.

Applicants respectfully request consideration of the information identified in the Information Disclosure Statement filed on June 4, 2004. Applicants note that the "Foreign Patent Documents" and "Other Documents" identified on the PTO-1449 forms returned with the office action have been crossed-out without any explanation being provided. To ensure that these documents are identified on any patent issued based on this application, these "Foreign Patent Documents" and "Other Documents" are re-submitted in an Information Disclosure Statement filed concurrently herewith.

Claims 1, 9 and 16 were rejected under 35 U.S.C. Section 112, second paragraph, as allegedly being indefinite. Applicants respectfully submit that the phrase "enhanced functionality" is readily understandable in the claimed context and does not render the claims indefinite. *See also* discussions of example embodiments at page 37, lines 4-9 and page 44, line 15 to page 45, line 1. With respect to the phrase "high capacity", while Applicants believe this phrase is likewise readily understandable in the claimed context, Applicants have deleted this language from the claims to advance prosecution.

Claims 1-6 and 8 were rejected under 35 U.S.C. Section 103(a) as allegedly being "obvious" over Nakagawa (U.S. Patent No. 4,799,635) in view of Yamamuro *et al.* (U.S. Patent No. 4,908,610). Applicants traverse this rejection.

The office action alleges that Nakagawa teaches a video game system including a main processing unit (24, 28); picture processing circuitry (26); user controls (14a, 14b); security processing circuitry (34, 30); "the inclusions of a read only memory (ROM) cartridge or optical disk for storing video data (16, 42, 44, Fig. 8-10, & col. 9:59-64)"; and a port (20) for receiving a removable device. *See* 7/29/04 Office Action, page 3.

Among other things, Nakagawa does not show or suggest a removable device comprising processing circuitry as claimed. More specifically, the office action identifies element "34" of

Nakagawa as part of the "security processing circuitry" (a feature recited in claim 6). However, the office action contains no discussion of the processing circuitry specified in claim 1, nor does Nakagawa disclose or suggest such circuitry. While element "34" of the removable device 16 of Nakagawa could be characterized as a processor, this processor does not access compressed video data from a storage device storing compressed video data, decompress video data and/or transfer video data for display on a display screen as specified in claim 1.

In particular, Nakagawa describes element 34 as a "key" which computes a result that is compared with a result computed by lock 30. If the results do not coincide, the lock device holds the reset state of the game microprocessor 24 and the picture processing unit 28. Thus, the main unit 12 is prevented from executing the game program stored in program ROM 42. On the other hand, if the results coincide, the lock device 30 releases the reset states of the game microprocessor and the picture processing unit and the game program stored in program ROM 42 can be executed. *See, e.g.,* col. 7, lines 23-39. There is no disclosure or suggestion in Nakagawa that ascribes to element 34 any of the features of the processing circuitry recited in claim 1.

Yamamuro *et al.* is applied as allegedly disclosing the use of "video compression/decompression for the display of color images." *See* 7/29/04 Office Action, page 3. However, even assuming for the sake of argument that this feature were properly applicable to Nakagawa, Yamamuro *et al.* does not remedy the deficiencies of Nakagawa with respect to the claimed processing circuitry. As such, the proposed combination would not have resulted in the subject matter of claims 1-6 and 8.

Further, with respect to the statements in the office action regarding an ALU, Applicants do not contest the existence of ALU's. However, claim 8 calls for a particular arrangement of an ALU, an instruction bus and a cache memory and the discussion bridging pages 3 and 4 of the office action provides no discussion of such an arrangement in the context of the claimed invention.

Claims 7 and 9-22 were rejected under 35 U.S.C. Section 103(a) as allegedly being "obvious" over Nakagawa in view of Yamamuro *et al.*, in further view of Loffredo (U.S. Patent

No. 5,016,876). Loffredo is cited for its alleged disclosure of a cache memory and associated controllers. However, even assuming for the sake of argument that this alleged feature were properly applicable to the proposed Nakagawa-Yamamuro *et al.* combination, Loffredo does not remedy the deficiencies of Nakagawa and Yamamuro *et al.* with respect to the claimed processing circuitry of claims 1, 9 and 16. As such, the proposed combination would not have resulted in the subject matter of claims 7 and 9-22.

Claim 8 was rejected under 35 U.S.C. Section 103(a) as allegedly being "obvious" over Nakagawa in view of Yamamuro *et al.*, further in view of Rosenthal (U.S. Patent No. 4,053,740). Rosenthal is cited for its alleged disclosure of an ALU connected to a system bus. However, even assuming for the sake of argument that Rosenthal could be viewed as showing an arrangement of an ALU, an instruction bus and a cache memory as in claim 8, Rosenthal does not remedy the deficiencies of Nakagawa and Yamamuro *et al.* with respect to the processing circuitry of claim 1. As such, the forced combination of these references would not result in the subject matter of claim 8 (which depends from claim 1).

New claims 23-32 have been added. The subject matter of these new claims is fully supported by the original disclosure and no new matter is added.

Claim 23 describes a removable device for use in an information processing apparatus, the device comprising means for addressing a storage device and reading out compressed video data therefrom, for decompressing the video data and for transferring the video data for display on a display screen. No such arrangement is shown or suggested by the applied references. Consequently, claim 23 and its dependent claim 24 are believed to be allowable.

Claim 25 describes a removable device for use in an information processing apparatus, the device comprising processing circuitry which addresses a storage device and reads out compressed video data therefrom, decompresses the video data and transfers the video data for display on a display screen. No such arrangement is shown or suggested by the applied references. Consequently, claim 25 and its dependent claims 26-32 are believed to be allowable.

SAN *et al.*

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The pending claims are believed to be allowable and favorable office action is respectfully requested.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By:   
Michael J. Shea  
Reg. No. 34,725

MJS:dbp  
1100 North Glebe Road, 8th Floor  
Arlington, VA 22201-4714  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100